

The Honorable Carl Levin
United States Senate
Washington, D.C. 20510

Dear Senator Levin:

Thank you for your August 1, 2013 letter regarding your concerns about the Allied Paper Landfill portion of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site in Kalamazoo, Michigan.

As you know, the U.S. Environmental Protection Agency is evaluating a variety of cleanup alternatives for this site.

Superfund law does favor treatment of highly contaminated or highly mobile material. The National Contingency Plan also directs EPA to favor the use of engineered barriers at sites where the waste is immobile and poses a low long-term threat 300.430(a)(iii)(A). EPA has analyzed 383 soil and 366 groundwater or leachate samples from the Allied Landfill and has concluded that the waste meets this definition of immobile. EPA has selected the implementation of engineered barriers at over 40 sites in Region 5 alone.

EPA will continue to critically analyze the costs of any potential cleanup alternatives, including the long-term costs of operation and maintenance of any alternatives that leave waste in place. The Allied Landfill Feasibility Study will include detailed cost estimates for each alternative. Costs related to loss of business activities or potential tax revenues can not be factored into the cost evaluation of a potential remedy (CFR Vol. 55, No. 46 8723).

EPA continues to evaluate multiple cleanup alternatives and it is confident that when a remedy is selected it will address all current and future threats from site contamination and will protect human health and the environment.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Ronna Beckmann or Denise Gawlinski Fortin, the Region 5 Intergovernmental Liaisons, at (312) 886-3000.

Sincerely,

Susan Hedman
Regional Administrator